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11 Attorneys for Defendant
12 CREATE NEW TECHNOLOGY (HK) CO. LTD.
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CHINA CENTRAL TELEVISION, A
China company; CHINA
INTERNATIONAL
COMMUNICATIONS, CO., LTD., a
China company; TVB HOLDINGS
(USA), INC., a California corporation;
and DISH NETWORK L.L.C. a
Colorado limited liability company,

Plaintiffs,

vs.

CREATE NEW TECHNOLOGY
(HK) LIMITED, a Hong Kong
Company, HUA YANG
INTERNATIONAL TECHNOLOGY
LIMITED, a Hong Kong Company,
SHENZHEN GREATVISION
NETWORK TECHNOLOGY CO.,
LTD., a China company, CLUB

Case No. CV 15-1869 MMM (AJWx)

Assigned for all purposes to:
Honorable Margaret M. Morrow

**STIPULATION TO EXTEND TIME
FOR DEFENDANT CREATE NEW
TECHNOLOGY (HK) CO. LTD. TO
RESPOND TO COMPLAINT BY NOT
MORE THAN 30 DAYS**

[C.D. Cal. Loc. R. 8-3]

STIPULATION TO EXTEND TIME FOR DEFENDANT CREATE NEW
TECHNOLOGY (HK) CO. LTD. TO RESPOND TO COMPLAINT

1 TVPAD, INC., a California
2 corporation; BENNETT WONG, an
3 individual; ASHA MEDIA GROUP
4 INC. d/b/a TVPAD.COM, a Florida
5 corporation; AMIT BHALLA, an
6 individual; NEWTPAD LTD.
7 COMPANY d/b/a NEWTPAD.COM
8 a/k/a TVPAD USA, a Texas
9 corporation; LIANGZHONG ZHOU,
10 an individual; HONGHUI CHEN
11 d/b/a E-DIGITAL, an individual;
12 JOHN DOE 1 d/b/a BETV; JOHN
13 DOE 2 d/b/a YUE HAI; JOHN DOE 3
14 d/b/a 516; JOHN DOE 4 d/b/a HITV;
15 JOHN DOE 5 d/b/a GANG YUE;
16 JOHN DOE 6 d/b/a SPORT ONLINE;
17 JOHN DOE 7 d/b/a GANG TAI WU
18 XIA; and JOHN DOES 8-10,

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20 Defendants.
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1 Defendant CREATE NEW TECHNOLOGY (HK) CO. LTD. ("Create"), on
2 the one hand, and Plaintiffs CHINA CENTRAL TELEVISION, CHINA
3 INTERNATIONAL COMMUNICATIONS CO., LTD, TVB HOLDINGS (USA),
4 INC. AND DISH NETWORK L.L.C., on the other hand (collectively, the
5 "Parties"), by and through their respective counsel of record, hereby stipulate as
6 follows:

7 WHEREAS, Plaintiffs filed their Complaint on March 13, 2015;

8 WHEREAS, Plaintiffs served their Complaint on Defendant Create on March
9 18, 2015, making the current deadline for Create to respond to the Complaint April
10 8, 2015;

11 WHEREAS, in order to allow sufficient time for Create to evaluate Plaintiffs'
12 claims and prepare a responsive pleading, the Parties have agreed that Create may
13 have a brief extension, until and including April 22, 2015, to respond to Plaintiffs'
14 Complaint; and

15 WHEREAS, Create has not made any prior requests for an extension of time
16 to respond in this action.

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1 NOW, THEREFORE, the Parties stipulate and agree, pursuant to Local
2 Rule 8-3, to extend the time for Defendant Create to answer or otherwise respond to
3 Plaintiff's Complaint up to and including April 22, 2015.

4 DATED: April 8, 2015

5 YOUNG, ZINN & BATE LLP

6 By: /s/ Lester F. Aponte
7 LESTER F. APONTE
8 Attorneys for Defendant
9 CREATE NEW TECHNOLOGY (HK)
10 CO. LTD.

11 DATED: April 8, 2015

12 DAVIS WRIGHT TREMAINE LLP

13 By: /s/ Carla A. McCauley
14 CARLA A. McCAULEY
15 Attorneys for Plaintiffs
16 CHINA CENTRAL TELEVISION,
17 CHINA INTERNATIONAL
18 COMMUNICATIONS, CO., LTD., TVB
19 HOLDINGS (USA), INC., and DISH
20 NETWORK L.L.C.

PROOF OF SERVICE

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of 18 and not a party to the within action. My business address is 888 S. Figueroa Street, 15th Floor, Los Angeles, California 90017.

5 On April 8, 2015, I hereby certify that I electronically filed the foregoing
6 document described as **STIPULATION TO EXTEND TIME FOR**
7 **DEFENDANT CREATE NEW TECHNOLOGY (HK) CO. LTD. TO**
8 **RESPOND TO COMPLAINT BY NOT MORE THAN 30 DAYS** with the Clerk
9 of the Court for the United States District Court, Central District of California.
10 Participant(s) in the case who are registered users will be served by the CM/ECF
system, electronically transmitted on the following interested parties in this action at
the email addressed below:

<p>Carla A. McCauley, Esq. DAVIS WRIGHT TREMAINE LLP 865 So. Figueroa Street 24th Floor Los Angeles, CA 90017 Tel: (213) 633-6800 Fax: (213) 633-6899 Email: carlamccauley@dwt.com</p>	<p>Representing PLAINTIFFS</p>
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I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on April 8, 2015, at Los Angeles, California.

Patty Flores